

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ATLAS KITCHENWARE & HARDWARE,
d/b/a KARLIN-RICHTON COMPANY

Plaintiff,

v.

Civil Action No. 05-11779 NG

QUICKIE MANUFACTURING
CORPORATION,

)
)
)
)

Defendant

**MOTION TO ADMIT
NON-RESIDENT ATTORNEYS *PRO HAC VICE***

I, Jeffrey W. Moss, of the law firm of Morgan, Lewis & Bockius LLP, counsel for defendant, Quickie Manufacturing Corporation, hereby move for the admission *Pro Hac Vice* of Attorneys Richard G. Rosenblatt and Scott E. Ross of Morgan, Lewis & Bockius LLP in Princeton, New Jersey pursuant to L.R. 83.5.3(b). The Affidavits of Attorneys Rosenblatt and Ross are submitted herewith in support of this motion

Respectfully submitted,

QUICKIE MANUFACTURING CORPORATION
By Its Attorneys,

/s/ Jeffrey W. Moss

Jeffrey W. Moss, BBO# 552421
Morgan, Lewis & Bockius LLP
225 Franklin Street, Suite 1705
Boston, Massachusetts 02110
Tel: 617.451.9700
Email: jmoss@morganlewis.com

Dated: November 21, 2005

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing *Motion to Admit Non-Resident Attorney Pro Hac Vice, Affidavit of Richard G. Rosenblatt in Support of Motion to Admit Non-Resident Attorney Pro Hac Vice, and Affidavit of Scott E. Ross in Support of Motion to Admit Non-Resident Attorney Pro Hac Vice* have been filed electronically, and have been forwarded *via* U.S. mail, this 21st. day of November 2005 to the following counsel of record:

Zachary B. Mack, Esq.
The Manufacturer's Representative Law Center
1701 Cass Lake Road
Keego Harbor, Michigan 48320-1047

Robert R. Berluti
Berluti & McLaughlin LLC
25 School Street
Boston, Massachusetts 02108

/s/ Jeffrey W. Moss
Jeffrey W. Moss

1-BO/101112.

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

**ATLAS KITCHENWARE &
HARDWARE, INC., a Massachusetts
corporation, d/b/a KARLIN-RICHTON
COMPANY**

Plaintiff,

v.

**QUICKIE MANUFACTURING
CORPORATION,**

Defendant.

Civil Action No. 05-11779 NG

**AFFIDAVIT OF RICHARD G. ROSENBLATT
OFFERED IN SUPPORT OF
MOTION TO ADMIT NON-RESIDENT ATTORNEY *PRO HAC VICE***

I, Richard G. Rosenblatt, hereby apply to the Court for permission to appear and participate in the above-entitled action on behalf of defendant Quickie Manufacturing Corporation, by whom I have been retained, and state

1 I am an partner in the law firm of Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, New Jersey 08540-6241 My telephone number is: 609.919.6609.

2. I have been retained by Defendant, Quickie Manufacturing Corporation, in this matter.

3. I have been a member in good standing with the New Jersey and Pennsylvania state bars since 1990, where I am admitted to practice. I am also admitted to practice in the United States Courts of Appeal for the Third, Fourth, and Sixth Circuits, as well as the United


States District Courts for the District of New Jersey, the Eastern and Western Districts of Pennsylvania, and the District of Connecticut.

4. There are no disciplinary proceedings or criminal charges pending against me as a member of any bar.

5. I am familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts.

6. I have represented Quickie Manufacturing Corporation in employment and similar matters and it has requested that I represent its interests in this matter.

declare under penalty of perjury that the foregoing is true and correct.


Richard G. Rosenblatt

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

**ATLAS KITCHENWARE &
HARDWARE, INC., a Massachusetts
corporation, d/b/a KARLIN-RICHTON
COMPANY**

Plaintiff,

v.

**QUICKIE MANUFACTURING
CORPORATION,**

Defendant.

Civil Action No. 05-11779 NG

**AFFIDAVIT OF SCOTT E. ROSS
OFFERED IN SUPPORT OF
MOTION TO ADMIT NON-RESIDENT ATTORNEYS *PRO HAC VICE***

I, Scott E. Ross, hereby apply to the Court for permission to appear and participate in the above-entitled action on behalf of defendant Quickie Manufacturing Corporation, by whom I have been retained, and state:

1 I am an associate with the law firm of Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, New Jersey 08540. My telephone number is: 609.919.6682.

2. I have been retained by defendant Quickie Manufacturing Corporation in this matter.

3. I have been a member in good standing with the New Jersey and Pennsylvania Bars since 2001, and the District of Columbia Bar since 2002. I am also admitted to practice in the United States Court of Appeals for the Third Circuit, as well as the United States District Courts for the District of New Jersey and the Eastern Districts of Pennsylvania.

4. There are no disciplinary proceedings or criminal charges pending against me as a member of any bar.

5. I am familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts.

6. I have represented Quickie Manufacturing Corporation in employment matters and it has requested that I represent its interests in this matter.

I declare under penalty of perjury that the foregoing is true and correct.



Scott E. Ross